



City of Helena

Public Works Department

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Emilio Llamozas
NPDES and Wetlands Enforcement Section
Enforcement and Compliance Assurance Division

Dear Mr. Emilio Llamozas,

Below is our attempt to provide the information requested in your July 8, 2020 letter, "Responsive comments to the City of Helena's June 11, 2020 response to EPA's Letter of Violation".

4. "By July 16, 2020, please provide us with final, current copies of both the Decorative Industrial Plating (DIP) and Montana Rail Link (MRL) industrial user permits"

Documents attached to this e-mail.

7. "By July 16, 2020, please clarify what additional guidance is still sought by the City, if any".

Additional Guidance Requested:

Does EPA have additional guidance for acceptable industrial waste survey procedures?
Is an example of an acceptable industrial waste survey form available from EPA?

8a. "By July 16, 2020, please provide the PH sampling records performed by the City at DIP since September 2017. Please also provide the accompanying PH calibration records"

Documents attached to this e-mail.

8b. "By July 16, 2020, please provide the EPA with the DIP and MRL inspection reports performed in 2018, 2019 and 2020.

Documents attached to this e-mail.

8c. "By July 16, 2020, please provide the DIP inspection reports performed by the City 2018 and 2019 and DIP self-monitoring reports for 2018, 2019 and 2020.

Documents attached to this e-mail.

8d. "By July 16, 2020, please provide the City's latest TTO sample results for the DIP discharge".

TTO sampling has not been performed because the current Industrial User Permit for DIP does not require TTO sampling and analysis. We will start performing this with the new permit and inspections.

10. "By July 16, 2020, please answer the following questions".

1. Is the City planning to hire a Pretreatment Coordinator in the future?

Yes, the City will continue to look for a Pretreatment Coordinator with sole duties being the Pretreatment Program. Currently, a ½ time position was approved by the City Commission in the FY21 budget. This position has been difficult to fill with the proper qualifications at ½ time. Currently, I foresee using several resources to complete all pretreatment duties. Our current team is qualified and consists of the Pretreatment Coordinator as Mark Fitzwater, Wastewater Treatment Plant Superintendent; Matt Culpo P.E., Pretreatment Program Manager; Travis Ball, Chemical Engineer; and LeAnn Wiegand P.E., Consultant with CDM Smith.

2/3. Is the Contractor performing all pretreatment responsibilities, including but not limited to, industrial waste survey review, issuing and modifying industrial user permits, review of IU self-monitoring reports, sampling of IU's, and enforcement?

No, CDM Smith's duties are limited to technical assistance as needed and has primarily consisted of Local Limits, Industrial User Permits and Sampling and Analysis Plans. All other duties are completed by the City of Helena staff.

I'm hopeful we have addressed your questions in preparation for our meeting and I'm looking forward to a productive meeting next week.

Sincerely,

Phil Hauck
Interim Public Works Director